



U.S. Department of Justice

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May 16, 2022

ECF

The Honorable Michael A. Shipp
United States District Judge
United States District Court for the District of New Jersey
Clarkson S. Fisher Federal Building & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: United States v. Eric G. Hafner
Crim. No. 19-790 (MAS)

Dear Judge Shipp:

The parties respectfully submit this letter regarding the status of the admissibility of the text messages pertaining to Counts Thirty-Two and Thirty-Three of the Indictment. Pursuant to the defendant's request, the government redacted a number of the text message communications that defendant viewed as highly prejudicial. While the defense maintains its objection to the admissibility of these text messages as originally stated in defendant's brief and argument in opposition to the government's motion *in limine*, the defense now agrees that, if admissible, the redactions to the text messages satisfy the Court's concern regarding prejudice to the defendant.

Respectfully submitted,

PHILIP R. SELLINGER
United States Attorney

s/ Ian D. Brater

By: Ian D. Brater
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cc: Mark Catanzaro, Esq.